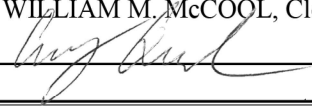


Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence
of the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington

April 14, 2021

WILLIAM M. McCOOL, Clerk

By  Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS ROMALLIS DANIELS,

Defendant.

No. CR21-069 JCC

INDICTMENT

The Grand Jury charges that:

COUNT 1

Felon in Possession of a Firearm

On or about April 7, 2021, at Bellevue, Washington, within the Western District of Washington, CARLOS ROMALLIS DANIELS, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: *Possession with Intent to Distribute Cocaine* and *Felon in Possession of a Firearm*, on or about October 19, 2007, in the United States District Court for the Western District of Washington, Case No. CR06-5350 RBL, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a Beretta Model Px4 Storm, .40 caliber pistol, with serial number PZ31605, which had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT 2

Possession of Controlled Substances with Intent to Distribute

On or about April 7, 2021, at Bellevue, Washington, in the Western District of Washington, CARLOS ROMALLIS DANIELS knowingly and intentionally possessed with intent to distribute substances controlled under Title 21, United States Code, Section 812, to wit: cocaine and cocaine in the form of cocaine base (crack cocaine).

The Grand Jury further alleges that the offense involved 28 grams or more of a mixture or substance containing a detectable amount of cocaine in the form of cocaine base (crack cocaine), and 500 grams or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 3

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about April 7, 2021, at Bellevue, Washington, within the Western District of Washington, CARLOS ROMALLIS DANIELS did possess a firearm, to wit: one Beretta Model Px4 Storm, .40 caliber pistol, with serial number PZ31605, in furtherance of a drug trafficking crime, to wit: *Possession of Controlled Substances with Intent to Distribute*, as charged in Count 2 above.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i).

ASSET FORFEITURE ALLEGATION

All of the allegations contained in this Indictment are realleged and incorporated by reference for the purpose of alleging forfeiture.

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Count 1***Felon in Possession of a Firearm***

Upon conviction of the offense alleged in Count 1, the defendant CARLOS ROMALLIS DANIELS shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and associated ammunition that were involved in the offense, including but not limited to a Beretta Model Px4 Storm, .40 caliber pistol, with serial number PZ31605.

Count 2***Possession of Controlled Substances with Intent to Distribute***

Upon conviction of the offense alleged in Count 2, the defendant CARLOS ROMALLIS DANIELS shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

Count 3***Possession of a Firearm in Furtherance of a Drug Trafficking Crime***

Upon conviction of the offense alleged in Count 3, the defendant CARLOS ROMALLIS DANIELS shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and associated ammunition that were involved in the offense, including but not limited to: one a Beretta Model Px4 Storm, .40 caliber pistol, with serial number PZ31605.

Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek the forfeiture of any other property of the defendant, up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL:

DATED: 4/14/21


*Signature of the Foreperson redacted
pursuant to the policy of the Judicial
Conference of the United States*

FOREPERSON


TESSA M. GORMAN
Acting United States Attorney


VINCENT T. LOMBARDI
Assistant United States Attorney


ERIN H. BECKER
Assistant United States Attorney


LYNDSIE SCHMALZ
Assistant United States Attorney